

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SARAH CHANG,

Plaintiff,

-against-

MICHAEL CHANG.

Defendant.

Case No. 1:25-cv-04917 (PAE)

Hon. Paul A. Engelmayer

**PLAINTIFF’S NOTICE OF MOTION FOR REMAND TO THE SUPREME COURT OF
THE STATE OF NEW YORK, COUNTY OF NEW YORK**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and exhibits attached thereto, Plaintiff Sarah Chang (“Plaintiff”), by and through counsel, will move this Court before the Honorable Paul A. Engelmayer, United States District Judge for the Southern District of New York, in Courtroom 1305 of the United States Courthouse, located at 40 Foley Square, New York, New York, 10007, at a time and date to be designated by the Court, for an order to remand Plaintiff’s Motion for Summary Judgment in Lieu of a Complaint to the Supreme Court of the State of New York, County of New York.

Dated: June 23, 2025
New York, New York

Respectfully submitted,

BAKER BOTTS L.L.P.

/s/ Andrew M. Lankler

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Counsel for Plaintiff Sarah Chang

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of June 2025, true and correct copies of **PLAINTIFF’S NOTICE OF MOTION FOR REMAND TO THE SUPREME COURT OF THE STATE OF NEW YORK, COUNTY OF NEW YORK, MEMORANDUM OF LAW IN SUPPORT, AND EXHIBITS THERETO** were filed with the Clerk of the Court, Southern District of New York, and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Andrew M. Lankler
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